

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re HIKO ENERGY LLC Litigation

Case No. 14-CV-01771 (VB)

**DECLARATION OF
MATTHEW D. SCHELKOPF
IN SUPPORT OF AWARD OF
ATTORNEYS' FEES
AND REIMBURSEMENT OF
EXPENSES**

MATTHEW D. SCHELKOPF, of full age, declares as follows:

1. On August 8, 2014, I was appointed interim Co-Lead Class Counsel in this matter. *See* Docket Entry No. 30. I am a former Partner of Chimicles & Tikellis LLP, 361 West Lancaster Avenue, Haverford, Pennsylvania 19041 (“Chimicles & Tikellis”). On February 6, 2016, I became a Partner of McCuneWright LLP, 1055 Westlakes Drive, Suite 300, Berwyn, Pennsylvania 19312 (“McCuneWright”); however, I have continued to work on this case as an independent contractor for Chimicles & Tikellis. I have been significantly involved in this matter since inception and am thus fully familiar with the facts set forth herein.

2. I submit this Declaration on behalf of Chimicles & Tikellis and in support of Plaintiffs’ motion for an award of attorneys’ fees and costs.

3. Chimicles & Tikellis was retained to work on this matter on a contingency fee basis and has not received any compensation for its services rendered in this case.

4. As counsel for the Plaintiffs in the Chen and Sasso cases, Chimicles & Tikellis was involved in all aspects of this litigation from the pre-suit investigation through eventual settlement.

5. Chimicles & Tikellis was heavily involved in the pre-litigation research of the alleged improper conduct, communications with potential plaintiffs, and eventual

selection of lead plaintiffs. Chimicles & Tikellis was also significantly involved in all aspects of discovery, as well as the research and briefing of several legal issues. While several other law firms were ultimately involved in this litigation, all firms made an effort to divide up the necessary work and avoid duplication of efforts wherever possible.

6. Chimicles & Tikellis has incurred a total of 235.75 hours from the inception of the Litigation through March 31, 2016. The hourly rates and lodestar of the individuals from Chimicles & Tikellis who participated in the Litigation are as follows:

Name	Status	Current Hourly Rate	Cumulative Hours	Cumulative Lodestar
Nicholas E. Chimicles	Partner	\$950	3.5	\$3,325
Joseph G. Sauder	Partner	\$700	4	\$2,800
Matthew D. Schelkopf	Partner	\$600	111	\$64,800
Benjamin F. Johns	Partner	\$550	5.75	\$3,162.50
Andrew W. Ferich	Associate	\$325	46.5	\$15,112.50
Joseph G. Kenney	Associate	\$300	41	\$12,300
Corneliu P. Mastraghin	Paralegal	\$250	3	\$750
Jesse D. Royer	Paralegal	\$150	2.75	\$412.50
Shelby R. Cain	Former Paralegal	\$175	6.25	\$1,093.75
Erica Kane	Former Law Clerk	\$225	12.00	\$2,700.00
TOTALS			235.75	\$ 106,456.00

7. The total lodestar for work performed by individuals at Chimicles & Tikellis equals \$102,662.50 This information was prepared from contemporaneous time records regularly maintained by Chimicles & Tikellis.

8. Chimicles & Tikellis incurred a total of \$2,042.72 in unreimbursed expenses. A chart detailing Chimicles & Tikellis' costs is included below.

Disbursement	Cumulative Amount
Travel Fees	\$172.37
Legal Research	\$204.14
Photocopying/Printing Fees	\$48.75
Expert Fees	\$1,600.00
Overnight Delivery/FedEx	\$15.85
Postage	\$1.61
TOTAL	\$2,042.72

9. The expenses incurred pertaining to this case that are discussed above are reflected in the books and records of Chimicles & Tikellis. These books and records are prepared from expense vouchers and check records prepared in the normal course of business, and are an accurate record of the expenses incurred.

10. I declare under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 25, 2016

By: 
Matthew D. Schelkopf,
(on behalf of Chimicles & Tikellis, LLP)
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